

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
RYNELL ROBERTS

Case No. Case: 2:21-mj-30448
Assigned To : Unassigned
Assign. Date : 9/23/2021
SEALED MATTER (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 30, 2020 thru February 21, 2021 in the county of Jackson in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1344	Bank Fraud
18 U.S.C. § 1028A	Aggravated ID Theft

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 23, 2021

City and state: Detroit, Michigan


Complainant's signature

SPECIAL AGENT SEAN CALLAGHAN, FBI
Printed name and title


Judge's signature

Kimberly Altman, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Sean Callaghan, being duly sworn, states as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have investigated a variety of federal criminal violations, including violent crime, bank robberies, crimes against children and various financial crimes, for approximately 18 years. I am currently assigned to the Detroit Metropolitan Identity Theft and Financial Crimes Task Force (DMIFT).
2. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation, reports that I have reviewed, documents and information provided by witnesses interviewed during this investigation, and materials provided by Synchrony Financial concerning their internal fraud investigation. The witnesses who were interviewed by DMIFT officers and agents pursuant to this investigation provided complete identification information which I maintain (none were anonymous sources). However, I am identifying them in this affidavit, which will become public, only by their initials to protect their identities. Because this affidavit

is being submitted for the limited purpose of establishing probable cause, I didn't include every fact I know concerning this investigation, but only the facts that I believe are necessary to establish probable cause to believe that Rynell Roberts committed Bank Fraud in violation of Title 18 U.S.C. Section 1344 and Aggravated Identity Theft in violation of Title 18 U.S.C. Section 1028A.

VIOLATION STATUTES

3. Title 18, United States Code, Section 1344, prohibits bank fraud: Whoever knowingly and willfully executes, or attempts to execute, a scheme or artifice—
 - (1) To defraud a financial institution
 - (2) To obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises shall be fined not more than \$1,000,000 or imprisoned not more than 30 years or both.

4. Title 18, United States Code, Section 1028A prohibits Aggravated Identity Theft:

(1) Whoever, during and in relation to any felony violation enumerated in subsection (c) (including bank fraud) knowingly transfers, possesses, or uses without lawful authority a means of identification of another person shall, in addition to the punishment provided for such felony, be sentenced to a term of imprisonment of two years. Title 18, United States Code, Section 1028(d)(7) defines a “means of identification” means any name or number that may be used, alone or in conjunction with any other information to identify a specific including a name, social security number, date of birth, government issued driver’s license

SUMMARY OF ALLEGATIONS

5. On August 31, 2020, an individual – subsequently identified as Rynell Roberts – entered a Lowes store in Jackson Michigan. Roberts opened a credit card account using victim M.H.’s personal identifiers. As part of the credit application process, this individual, hereafter Roberts, presented a fraudulent Michigan Driver’s License containing M.H.’s personal identifiers but

Roberts' photograph. Roberts was able to successfully obtain credit in M.H.'s name and purchased \$5,478.99 in merchandise with that credit. Roberts applied for credit in-store and did not provide an email. Roberts exited the store with the merchandise and proceeded to the Sam's Club in Jackson, Michigan where Roberts again obtained credit using M.H.'s information. Roberts applied for credit this time using a tablet and provided an email ending in 1256@yahoo.com.

6. Both Lowe's and Sam's Club's offer credit accounts through Synchrony Financial, an FDIC insured financial institution pursuant to Title 18, United States Code, Section 20. Roberts made a purchase of \$3,712.98 in merchandise and then another for \$211.87 with the credit account in M.H.'s name and exited the store. Both Lowe's and Sam's Club captured closed circuit video of Roberts conducting the transactions.
7. On December 19, 2020, Roberts returned to the Lowe's store in Jackson, Michigan. Roberts purported to be victim J.R. and applied for a credit card account using his information. As part of Synchrony's Identity Verification Process, Roberts submitted a

selfie video in which he represented himself to be victim J.R. as part of the application process. This time the credit application was denied. Roberts had already selected \$7,875.00 in merchandise. After being advised that his application was denied Roberts indicated that he had to go outside to get phone service. Roberts then had two Lowe's employees assist him with loading the merchandise in his U-Haul box truck. Roberts then drove away without paying for the merchandise.

8. On January 8, 2021, Roberts went to Lowe's stores in Saginaw and White Lake, Michigan impersonating victim J.E. Roberts was able to open a credit account in J.E.'s name. As part of Synchrony's Identity Verification Process, Roberts sent a selfie video of himself in which he represented himself to be victim J.E. Roberts charged a total of \$8,754.08 worth of merchandise to the account in J.E.'s name.
9. On February 9, 2021, Detective Sergeant Robert Shrock Jr. of the Blackman Township Public Safety Department was contacted by representatives of Synchrony Financial and Lowe's Home Improvement about a suspect opening fraudulent credit accounts

at Lowe's stores. The accounts were being opened in different victims' names but with a common email pattern ending in 1256@gmail.com. Synchrony identified seven fraudulent accounts that were opened using an email ending 1256@gmail.com resulting in \$68,990.72 in financial loss. D/Sgt. Shrock was advised that the suspect was likely heading to the Lowe's store in Jackson, Michigan after leaving a store in Battle Creek, Michigan where he attempted to open a credit card account through Synchrony using the name and personal information of victim A.P. D/Sgt. Shrock was provided a description of the vehicle driven by the suspect, a U-Haul box truck bearing Arizona registration #AJ31694 and truck #TT2374K. D/Sgt. Shrock was not able to locate the suspect vehicle at the Lowe's store but an officer did spot the vehicle in the Home Depot parking lot. After officers observed the suspect vehicle commit a moving violation a traffic stop was conducted on the vehicle and the driver was identified as Rynell Rodnie Roberts via his Michigan Driver's License.

10. Investigation revealed that Roberts had entered the Home Depot store, selected merchandise and completed a credit card

application using the personal information of victim A.P. Roberts presented a Michigan Driver's License with victim A.P.'s information on it but a photograph of Roberts. Roberts received approval for a credit card in the name of A.P. with a credit limit of \$6000.00. Roberts had selected merchandise to purchase for a total of \$5930.66 but left the store without the merchandise.


11. D/Sgt. Shrock advised Roberts of his Miranda rights. Roberts waived his rights and agreed to speak with D/Sgt. Shrock. Roberts admitted presenting the fraudulent driver's license at Home Depot as part of the credit application process. Roberts advised that he threw the fake license out the window of his vehicle when he realized he was being followed. Roberts admitted using A.P.'s information for the credit application. Roberts confirmed that he obtains driver's licenses with other people's information but his photograph. Roberts could not estimate how many of these transactions he had completed but admitted this was not the first time. Roberts stated that he got 30% of the proceeds from each fraudulent transaction.

12. On February 12, 2021, Roberts entered the Lowe's store in Sterling Heights, Michigan and applied for a credit card in the name of E.W. As part of Synchrony's Identity Verification Process, Roberts sent a selfie video of himself, in which he represented himself to be victim E.W. Roberts also presented a Michigan Driver's License with victim E.W.'s information on it but a photograph of Roberts. The credit account was approved and Roberts purchased \$8,819.30 worth of merchandise and charged it to the account he had just opened in the name of E.W.
13. On February 18, 2021, Roberts entered the Lowe's store in Big Rapids, Michigan and applied for a credit card in the name of victim M.D. As part of Synchrony's Identity Verification Process, Roberts provided a selfie video of himself in which he represented himself to be victim M.D. Roberts also presented a Michigan Driver's License with victim M.D.'s information on it but a photograph of Roberts. The credit account was approved and Roberts purchased \$12,062.59 worth of merchandise and charged it to the account he had just opened in the name of M.D.


14. On February 21, 2021, Roberts entered the Lowe's store in Commerce Township, Michigan and applied for a credit card in the name of victim D.M. As part of Synchrony's Identity Verification Process, Roberts provided a selfie video of himself in which he represented himself to be victim D.M. Roberts also presented a Michigan Driver's License with victim D.M.'s information on it but a photograph of Roberts. The credit account was approved and Roberts purchased \$8,906.47 worth of merchandise and charged it to the credit account he had just opened in the name of D.M.
15. An internal fraud investigation by Synchrony Financial identified eleven fraudulent accounts opened by Roberts. While opening seven of those accounts, Roberts used an email ending in 1256@gmail.com. Roberts was identified opening the Lowe's credit account in the name of victim M.H. and then opening an account at Sam's Club using an email ending in 1256@yahoo.com. Roberts was again positively identified by Blackman Township Police after using an email ending in 1256@gmail.com in an attempt to open an account for victim A.P. As a result of the fraudulent charges to

these eleven credit accounts, Synchrony suffered a financial loss of \$119,946.32.

16. All eleven victims were interviewed and advised that they did not give anyone permission to use their names, dates of birth, and or social security numbers for any purpose including applying for credit on their behalf. Synchrony Bank confirmed that personal identifiers such as social security and birthdates are required to apply for credit.
17. Based on the foregoing, there is probable cause to believe that Rynell Roberts committed the offense of Bank Fraud in violation of Title 18 U.S.C. Section 1344 and Aggravated Identity Theft in violation of Title 18 U.S.C. Section 1028A.


Sean Callaghan
Special Agent, FBI

Sworn to before me and signed in my presence and/or by reliable electronic means.


Honorable Kimberly G. Altman
United States Magistrate Judge

Dated: September 23, 2021